

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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This document relates to:

Ashton, et al. v. al Qaeda Islamic Army, et al., Case No. 02-CV-6977
Federal Ins. Co., et al. v. Al Qaida, et al., Case No. 03-CV-6978
Estate of O'Neill, et al. v. Republic of Iraq, et al., Case No. 04-CV-1076
Havlish, et al. v. bin Laden, et al., Case No. 03-CV-09848

AFFIRMATION OF JERRY S. GOLDMAN, ESQ.

I, Jerry S. Goldman, affirm under penalty of perjury that the following statements are true and correct, pursuant to 28 U.S.C. § 1746:

1. I am a shareholder at the law firm of Anderson Kill P.C., attorneys for the *O'Neill* Plaintiffs in the above-captioned litigation. As such, I am familiar with and have personal knowledge of the facts herein.

2. I make this Affirmation in support of the *Ashton*, *Federal* and *O'Neill* Plaintiffs' Opposition to the *Havlish* Motion for an Order Creating a Common Benefit Fund to Compensate *Havlish* Attorneys Regarding Default Judgments Against the Islamic Republic of Iran.

3. Attached hereto as Exhibit A is a true and correct copy of Case Management Order #3 for the above-captioned actions.

4. Attached hereto as Exhibit B is a true and correct copy of a February 27, 2004 Status Report and Proposed Case Management Order from *Havlish* counsel that they faxed to the Honorable Richard C. Casey.

5. Attached hereto as Exhibit C is a true and correct copy of a German Federal Prosecutor Report containing testimony of an Iranian intelligence defector, dated January 21, 2004.

Executed: May 5, 2016
New York, NY



Jerry S. Goldman